

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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DANIEL LOVELACE and  
HELEN LOVELACE, Individually,  
and as Parents of BRETT LOVELACE,  
Deceased,

Plaintiffs,

VS.

NO. 2:13-cv-02289 dkv  
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
BABU RAO PAIDIPALLI; and  
MARK P. CLEMONS,

Defendants.

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**PLAINTIFFS' AMENDED NOTICE TO TAKE VIDEOTAPED DISCOVERY  
DEPOSITION OF MARK P. CLEMONS, M.D.**

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TO: J. Kimbrough Johnson  
Marcy Dodds Magee  
Margaret Cooper  
2900 One Commerce Square  
40 S. Main Street  
Memphis, TN 38103

Please take Notice that the Plaintiffs in this action will take the audio-visual and stenographical evidentiary deposition of the Defendant, Mark P. Clemons, M.D., pursuant to Rule 30 of the Federal Rules of Civil Procedure, before a Notary Public or before some other officer authorized by law to administer oaths, and will continue from day to day until completed as follows:

**DEPONENT:** Mark P. Clemons, M.D.  
**DATE:** Thursday, February 6, 2014  
**TIME:** 10:00 a.m.

**PLACE:** Thomason Hendrix, et al  
2900 One Commerce Square  
40 S. Main Street  
Memphis, TN 38103

Respectfully submitted,

HALLIBURTON & LEDBETTER

/s/ Mark Ledbetter

MARK LEDBETTER AR# 74175

Attorney for Plaintiffs TN#17637

254 Court Avenue, Suite 305

Memphis, TN 38103

(901) 523-8153-phone

(901) 523-8115-fax

[Mark794@aol.com](mailto:Mark794@aol.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been properly served upon all counsel of record identified below via the Court's ECF filing system

J. Kimbrough Johnson/Marcy Dodds Magee/Margaret Cooper

2900 One Commerce Square

40 S. Main Street

Memphis, TN 38103

Attorneys for Mark Clemons

901/525-8721-phone

901/525-6722-fax

[Johnsonk@thomasonlaw.com](mailto:Johnsonk@thomasonlaw.com)

[MageeM@thomasonlaw.com](mailto:MageeM@thomasonlaw.com)

Albert G. McLean/David Cook  
The Hardison Law Firm  
119 S. Main Street, Suite 800  
Memphis, TN 38103  
Attorneys for Babu R. Paidipalli & Pediatric Anesthesiologists, P.A.  
901/525-8776 – phone  
901/525-8790 – fax  
[amclean@hard-law.com](mailto:amclean@hard-law.com)

This 6<sup>th</sup> day of January, 2014.

/s/ Mark Ledbetter  
MARK LEDBETTER, Certifying Attorney